

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

SANTIAGO QUEZADA, SR.

Debtor

Case 24-22431-SHL

Chapter 11, Subchapter V

SUPPLEMENTAL DECLARATION OF MARIA JOSE PIZARRO

I, Maria Jose Pizaaro, hereby declare:

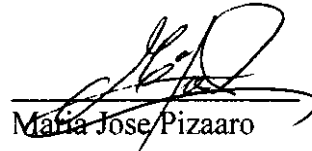
1. This declaration is being filed to supplement my January 7, 2025 declaration (ECF [#36](#)), submitted in relation to (a) my response to the Debtor's objection to Claim #6 filed by me, through my attorney Evan Brustein, and cross-motion to allow the filing of the same after the claims bar date and to allow the same (ECF [#34](#), [#35](#)), and (b) my application to take discovery from the Debtor, Popular Bank and Scotiabank (ECF [#37](#)).

2. My prior declaration attached as Exhibit 1 (ECF [#36-1](#)) a Dominican real property public records search, for properties owned by the Debtor. Prior to making the above motions, I had ordered a description of the real property parcels listed in that search. However, the property description was not provided to me until this afternoon, after the filing deadline which I understand is fourteen days before the January 22, 2025 hearing. I am accordingly making this supplemental declaration to attach the property description as Exhibit 5 so the Court can review the same prior to the hearing. The property description shows, that contrary to the Debtor's description in his Schedule A/B (ECF [#11](#)) and proposed plan (ECF [#28](#)), which describe his Dominican real property as either rural property/land, or "farm with home" or "lot ... that may be used for farming", his Dominican properties appear to be located mainly in urban areas. No mortgage on these properties appears to be listed in his Schedule D either, which also indicates that any vehicle loan on 2020 Mercedes GLS kept in the Dominican Republic (see Schedule A/B Item 3.2) has

been paid off. This underscores the need for discovery concerning the Debtor's Dominican real property.

3. In addition, attached as Exhibit 6 is a true copy of Claim #6, which I understand was inadvertently omitted from the motion papers.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on January 9, 2025.


Maria Jose Pizaaro